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## Federal Defenders OF NEW YORK, INC.

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outhern District of New York

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Attorney-in-Charge

David E. Patton
Executive Director

January 14, 2021

VIA E-MAIL AND ECF
Honorable Colleen McMahon
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: United States v. James Johnson, 20 CR 687 (CM)

Dear Judge McMahon:

With the consent of Mr. Johnson's supervising pretrial officer and the government, I write to seek a modification to Mr. Johnson's bail conditions so that he can attend his wife's baby shower tomorrow. The baby shower will be held in a rec room in the basement of Mr. Johnson and his family's apartment building. In addition to other conditions, Mr. Johnson is subject to home detention. Because the baby shower is held outside of his apartment unit, he needs the Court's permission to attend. If Mr. Johnson is granted permission, he will attend the shower from its beginning at 5 p.m. until no later than midnight so that he can help with the clean-up.

The government and Pretrial Services-New York do no object to this application. Pretrial Services-New Jersey (the agency directly responsible for Mr. Johnson's supervision) defers to Pretrial Services-New York but has confirmed that Mr. Johnson has been fully compliant with his bail conditions since his release.

Respectfully submitted,

/s/ JULIA GATTO

Julia L. Gatto Assistant Federal Defender

cc: AUSA Matthew Shahabian (via email and ECF)
NJ-USPO Hernandez (via email)
NY-USPO Cosme (via email)

